

IN THE COURT OF COMMON PLEAS  
FRANKLIN COUNTY, OHIO

|                                  |   |                                |
|----------------------------------|---|--------------------------------|
| DAWN ZIMMERMAN AND,              | ) | CASE NO. 21-CV-006803          |
| DENNIS ZIMMERMAN,                | ) |                                |
|                                  | ) | JUDGE JEFFREY M. BROWN         |
| Plaintiffs,                      | ) |                                |
|                                  | ) |                                |
| v.                               | ) | <b>MOTION FOR ADMISSION TO</b> |
|                                  | ) | <b>APPEAR PRO HAC VICE</b>     |
| RUSS STEAMER SERVICE LLC dba RSS | ) |                                |
| TRAILER REPAIR, AMERIT FLEET     | ) |                                |
| SOLUTIONS, INC., <i>et al.</i> , | ) |                                |
|                                  | ) |                                |
| Defendants.                      | ) |                                |

Pursuant to Gov. Bar R. XII (2)(A)(6), Kelly E. Mulrane, attorney for Defendant Amerit Fleet Solutions, Inc. (“AFS”), hereby respectfully moves the Court to grant Heather M. Sager permission to appear *pro hac vice* and participate as co-counsel in this case on behalf of AFS.

Ms. Sager represents that she is licensed to practice law in the State of California (Bar No. 186566) since December 1996 and the U.S. District Court, Central District of California since December 1996, the U.S. District Court, Eastern District of California since January 1999, the U.S. District Court, Northern District of California since February 1999, the Ninth Circuit Court of Appeals since April 2014, the U.S. District Court, Southern District of California since February 2017, and the U.S. District Court, Eastern District of Arkansas since October 2021.

Ms. Sager represents that she has not been granted permission to appear *pro hac vice* in more than three proceedings before Ohio tribunals in the current calendar year pursuant to Gov. Bar R. XII(2)(A)(5). She represents that she is familiar with this Court’s Local Rules and the appropriate Ohio Civil Rules, Rules of Evidence, and Rules of Professional Conduct. Kelly E. Mulrane is an active Ohio attorney in good standing and will continue to work with Ms. Sager on this case.

The affidavit required by Gov.Bar R. XII(2)(A)(6) as well as a copy of Ms. Sager's Certificate of Pro Hac Vice Registration furnished by the Supreme Court of Ohio Office of Attorney Services (PHV Registration No. PHV-25610-2022) are attached.

Ms. Sager understands that, if this Motion is granted, she must file a Notice of Permission to Appear Pro Hac Vice and a copy of the Order granting permission with the Supreme Court of Ohio Office Attorney Services within 30 days of the Order.

Respectfully Submitted,

/s/ Kelly E Mulrane  
Kelly E. Mulrane (0088133)  
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/s/ Heather M. Sager  
Heather M. Sager (PHV-25610-2022)  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion for Permission to Appear Pro Hac Vice was filed electronically on the 23rd day of December, in accordance with the Court's Electronic Filing Guidelines. Notice of this filing will be sent to all parties by operation of the Court's Electronic Filing System. Parties may access this filing through the Court's Filing System.

/s/ Kelly E. Mulrane

Kelly E. Mulrane (0088133)

*One of the Attorneys for Defendant Amerit  
Fleet Solutions, Inc.*